# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

CATHY CARTER,	)	
Plaintiff,	)	
V.	) ) )	Civil Action No.: 1:20-cv-01674-TWT-JSA
PAUL HOWARD, in his individual and official capacity,	)	
Defendant.	)	

# PLAINTIFF'S MOTION REQUESTING LEAVE OF COURT TO FILE AN AMENDED STATEMENT OF ADDITIONAL FACTS

COMES NOW Plaintiff, Ms. Cathy Carter, requesting leave of this Honorable Court to file an Amended Statement of Additional Facts.

Unfortunately, while Plaintiff responded to 82 statements of material facts and added 47 additional facts, Plaintiff erred by failing to support two additional statements (26, 24) with citations.

Respectfully submitted this 13th day of December 2022,

/s/Mario B. Williams Mario B. Williams Ga. Bar No. 235254

#### **HDR LLC**

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/s/David E. Betts
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### **BETTS & ASSOCIATES**

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Attorneys for Plaintiff

## **CERTIFICATE OF SERVICE**

I hereby certify that on this day PLAINTIFF'S MOTION REQUESTING LEAVE OF COURT TO FILE AN AMENDED STATEMENT OF ADDITIONAL FACTS was sent to all counsel of record via CM/ECF which automatically serves an email notification to all counsel of record.

Respectfully submitted this 13th day of December 2022,

/s/Mario B. Williams Mario B. Williams Ga. Bar No. 235254

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